

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF  
NEW YORK

In re:

BRIAN H. DENKER  
Debtor

2015 OCT -5 P 1:51

Chapter 11 **RECEIVED**  
Case Number 15-41069

-----X  
ORDER TO SHOW CAUSE

The debtor, Brian H. Denker-Youngs, appears herein on emergency before this honorable court the 4<sup>th</sup> day of October, 2015 and submits this Order to Show Cause, seeking an order from the honorable court vacating the conversion of the petition of the debtor from Chapter 11 to 7.

Debtor, Brian H. Denker-Youngs alleges under penalty of perjury and herein states,

1. I am the debtor in Chapter 11 petition filed before this honorable court on March 13, 2015.
2. Your deponent makes reference to the Order to Show Cause for an injunction and stay filed with this court today and the allegations contained therein.
3. For the reasons contained there in, including that your deponent is of the belief that counsel to the deponent Lawrence Morrison of Morrison and Tennenbaum PLLC has been working in direct conflict of your deponents best interests, a filing and conversion from Chapter 11 to 7 was prematurely converted and filed without consent or knowledge of your deponent.
4. As was provided for, several of the schedules as alerted to Morrison in March

were missing several debts to have been included as well as contained the incorrect legal name of your deponent.

5. Your deponent is of the belief that such filing for a conversion premature to the October 14, 2015 hearing date for conversion was done intentionally in an attempt to harm your deponent orchestrated by your deponents estranged spouse in collusion with his attorneys and Lawrence Morrison.
6. On the evening of Thursday, October 1, 2015, your deponent began sending documentation and emails to the attention of Mr. William Curtin with the United States Department of Justice Bankruptcy Trustee's Office and to notify him of such concerns of underhanded and unethical misconduct.
7. As was illustrated in the Order to Show Cause seeking an injunction and stay of all proceedings, funds by way of your debtors estranged spouse and his filing of Statement of Net worth showcase the availability of funds to clear the debts to which such were to be verified during a 2004 Application.
8. Your deponent has an audio recorded on his mobile telephone of the meeting between your deponent and Mr. Morrison to which took place on Thursday, October 1, 2015 to which the context of the meeting was the very facts supporting the filing of the objection to relief filed by Edward J Denker-Youngs, the 2004 Application and depositions of Edward J Denker-Youngs to go forward.

WHEREFORE, the debtor Brian H. Denker-Youngs objects to the pre-mature conversion of the Chapter 11 petition filed with his court and seeks an order of the honorary court,

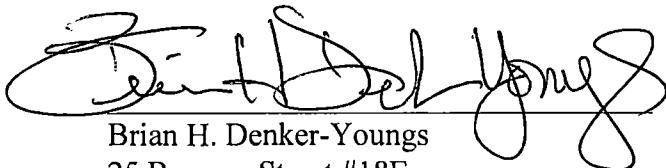
1. Vacating the conversion of Case No. 15-41069 from Chapter 11 to Chapter

7 as there will come upon your deponent irrevocable harm will come upon your deponent as such without proper and just review and revisions of schedules.

2. Directing Edward J. Denker-Youngs appear before the honorable court and be directed to a 2004 Application and deposition to take place upon assignment of new counsel to the debtor.
3. Discharging with cause Lawrence Morrison of Morrison and Tenenbaum PLLC. as counsel to the debtor Brian H. Denker-Youngs and further staying all proceedings herein 30-days allowing debtor such time to secure new counsel and representation.
4. Any and all other relief this court deems just and proper.

Date: October 4, 2015

Respectfully Submitted,



Brian H. Denker-Youngs  
25 Boerum Street #18E  
Brooklyn, NY 11206  
t: 917-373-5019  
e: bhdunker@gmail.com